

REMARKS

Applicant thanks the Examiner for the Examiner's comments, which have greatly assisted Applicant in responding.

Further, Applicant thanks Examiner Ke for agreeing to an Examiner Interview after the filing of this instant Response and to agree to a Supplemental Response, if necessary. This way, Applicant does not have to incur any extension fees and the Examiner, newly assigned to the case, can have the time to be more informed on the facts of the case.

CLAIM REJECTIONS - 35 U.S.C. §102

Claims 35 and 36 are rejected under 35 U.S.C. §102(e) as being anticipated by Williams (US 7155683). Applicant respectfully traverses.

Claim 35 recites, in part,

wherein the user interface comprises a navigation key having a first set of controls for acceptance or non-acceptance of a most probable completion alternative currently displayed at the display and a second set of controls for changing or overriding the most probable completion alternative currently displayed at the display.

The Office Action asserts that Williams teaches the above cited feature at col. 6, lines 43-52 and col. 8, line 14 and to see Figures 6 and 8, elements 72 and 73. Further, the Office Action asserts that "[t]hese elements are part of the same graphical user interface key and are subject to various controls." This is incorrect.

Taking the last assertion first, Applicant is of the opinion that the phrase "are part of the same graphical user interface key" does not make sense. What is the graphical user interface key to which the Office Action refers?

Also, Williams does not disclose a single key (the claimed navigation key) that is subject to the various controls. Here, the Office Action is ignoring claim language (a navigation key) and as described in the specification.

Williams does not teach a navigation key having a first set of controls for acceptance or non-acceptance . . . Williams explicitly teaches different keys to perform these functions. For example, at col. 6, lines 40-42, Williams teaches that the softkey label 73 for the right softkey 24 changes to the "Clear" functionality, implying that the Clear functionality is used for the claimed "non-acceptance". Additionally, Williams explicitly teaches that "[t]he user accepts a word by pressing the space key (the key 67 – table 1)" at col. 6, lines 43-44. Thus, here, Williams teaches **two separate and distinct keys** for "non-acceptance" and "acceptance", in contradiction to what is claimed.

Moreover, Williams does not disclose a particular key for "changing or overriding" the most probable completion, that is, the "navigation key having a second set of controls for changing or overriding", as claimed. Williams **only discloses** "continuing typing" to achieve changing or overriding – and not by using the navigation key. For example, at col. 6, lines 28-32, Williams teaches that to affect change ("evolves a match" at col. 6, line 37), "[n]o matter what the display shows, the user simply types the next character in the word he wants to type." Thus, here, Williams does not teach a navigation key with the second set of controls for changing and overriding, but a completely different mechanism by which the user arrives at his or her desired content string.

Thus, in view of the above Williams does not teach one or more features of Claim 35.

Removal of the rejection is respectfully requested.

The dependent claims depend directly or indirectly from the claims that have been discussed. Therefore, those claims are deemed patentable for the reasons given above. In addition, each of the dependent claims separately introduces features that independently render the claim patentable. However, due to the fundamental

differences already identified, and to expedite positive resolution of the examination, separate arguments are not provided for each of the dependent claims at this time.

CLAIM REJECTIONS – 35 U.S.C. § 103

(a) Claims 1, 5-10, 16-20, and 25-29 are rejected under 35 U.S.C. §103(a) as being unpatentable over Comer *et al* ("Comer") US 5,845,300 in view of Bodnar *et al* ("Bodnar") US 6310634. Applicant respectfully traverses.

Claims 1 and 25

Claims 1 and 25 recite, in part:

initiating entry of a content string by receiving a first key selection input, **said first key corresponding to a first set of more than one textual characters;**

determining a most probable completion alternative using a personalized and learning database, said completion alternative being either (a) a most probable character selected from said first set of more than one textual characters or (b) a most probable sub-string, said sub-string beginning with said most probable character and including at least one additional character;

Support for the amendment, *i.e.* adding "more than one" to "textual characters", can be found at least in Figure 1, in which it is shown that each of the keys on keypad 110 have more than one textual character. For example, the key labeled "2" has the characters A, B, and C.

Claims 1 and 25 recite one or more features, *e.g.* as shown in bold above, that are not taught or fairly suggested by Comer and Bodnar, alone or in combination.

The approach of Claims 1 and 25 is that a first (or second) key corresponds to a set of more than one textual characters, such as the "2" key described above, which corresponds to the more than one textual characters, A, B, and C. Thus, when a user presses the "2" key, for example, Claims 1 and 25 **require** that the method determines

a most probable completion alternative using a **most probable character from said first set of more than one textual characters** (or "said most probable character" which refers to the previous requirement just stated.) Thus, for example, when a user presses the "2" key, according to the approach of Claims 1 and 25, either "A" or "B" or "C" is determined to the most probable character from said set of "A", "B", and "C" ("set of more than one textual characters").

In contrast, Comer's disclosure is directed to a spreadsheet program that provides suggested completions to the data entry operator. (Abstract) Comer only discloses that a list of completed data items is searched for an entry that matches the entered data item. Comer gives an example in Figure 3b, in which the user enters the letter "B" and the display shows "B" with a completion "raves" for "Braves".

Comer simply discloses a user pressing a key that has **only one textual character** (as opposed to more than one textual character) and, in response to such pressing, showing the character plus a word completion on a display. Comer **does not disclose** "said first key corresponding to a first set of more than one textual characters" as required by Claims 1 and 25. Moreover, Comer does not disclose:

"determining a most probable completion alternative using a personalized and learning database, said completion alternative being either (a) a most probable character selected from said first set of more than one textual characters or (b) a most probable sub-string, said sub-string beginning with said most probable character and including at least one additional character"

as required by Claims 1 and 25.

As well, according to the teachings of Comer, if the user had desired to enter "Braves" and pressed the "2" key (on which "B" resides and to which "B" corresponds), there is no teaching to show how displaying "Braves" can be achieved. Thus, if Comer were adapted to Claims 1 and 25, then Comer would be work as intended.

Bodnar does not remedy the deficiency of Comer. Claims 1 and 25 expressly recite "**initiating entry of a content string** by receiving a first key selection input, **said first key corresponding to a first set of more than one textual characters**". (Emphasis added) As well, Claims 1 and 25 expressly recite "receiving a second input, said second input being either a second key corresponding to a **second set of more than one textual characters**" (emphasis added). Thus, for example, a user presses the "3" key (which corresponds to "D", "E", and "F") and the "D" letter is displayed (see Figure 8 of instant application.) Next, the user presses the "7" button and the letter "r" is displayed, now preceded by the letter "F" (for "Francisco") instead of "D" as in the previous display.

According to the approach of Bodnar, a "letter strip with an active highlight to enter text" is displayed (Bodnar: Col. 22, lines 29-30). The way the user enters text is "[t]he user clicks BACK and NEXT to move to the desired letter... and presses SELECT to enter it." Thus, Bodnar's mechanism for allowing the user to enter a content string is completely different from that of Claims 1 and 25.

Therefore, in view of the above one skilled in the art would have no reason to combine Comer and Bodnar and no reason based on the references to arrive at Claims 1 and 25.

The dependent claims depend directly or indirectly from the claims that have been discussed. Therefore, those claims are deemed patentable for the reasons given above. In addition, each of the dependent claims separately introduces features that independently render the claim patentable. However, due to the fundamental differences already identified, and to expedite positive resolution of the examination, separate arguments are not provided for each of the dependent claims at this time.

Removal of the rejection and reconsideration are respectfully requested.

(b) Claims 11 and 16-20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Comer in view of Bodnar *et al* ("Bodnar") US 6310634 and further in view of Simpson *et al* ("Simpson") US 2004/0153963. Applicant respectfully traverses.

The dependent claims depend directly or indirectly from the claims that have been discussed. Therefore, those claims are deemed patentable for the reasons given above. In addition, each of the dependent claims separately introduces features that independently render the claim patentable. However, due to the fundamental differences already identified, and to expedite positive resolution of the examination, separate arguments are not provided for each of the dependent claims at this time.

CONCLUSION

Applicant respectfully posits that the pending claims are distinguished from the art of record, and that all rejections of the claims are overcome. Accordingly, Applicant respectfully requests allowance of all claims. The Examiner is invited and encouraged to contact Applicant's attorney or agent at (650) 474-8400 should any questions arise.

Respectfully submitted,



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